

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: FRANCIA S SMALL

) Case No. 19 B 10091
)
Debtor) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

FRANCIA S SMALL

7604 S HOYNE AVE
CHICAGO, IL 60620

DAVID M SIEGEL
via Clerk's ECF noticing procedures

Please take notice that on August 07, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on July 03, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On April 08, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Provide Pay Advices from 2/10 - 3/2 and 3/10 - 4/8 and amend Schedule I to list new job and provide proof of income and to amend Plan or explain plan provision providing for a secured claim to be paid to Cook County Treasurer in the amount of \$10,576 but a proof of claim filed by the Treasurer in the amount of \$1,040.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn